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10 Attorneys for Defendants
11 ETHICON, INC. (on its own behalf and behalf of its
12 Division, ETHICON WOMEN'S HEALTH &
13 UROLOGY, and erroneously sued as GYNECARE,
14 INC.); and JOHNSON & JOHNSON

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

LYNNETTE BLACKMAN, an individual,
PAMELA AGUILAR, an individual,
BETTY GIPE, an individual, EDITH
ROBERTSON, an individual, LAURA
VUJOVICH, an individual, ANNETTE
CONSALVOS, an individual, and JOYCE
FLYNN, an individual,

Plaintiffs,

v.

GYNECARE, INC. a California
Corporation; ETHICON, INC. a New
Jersey corporation, JOHNSON &
JOHNSON, a New Jersey corporation,
DOE MANUFACTURERS one through
one hundred,

Defendants.

Case No. 4:10-CV-04741-PJH

**STIPULATION AND JOINT REQUEST
FOR RELIEF FROM CASE
MANAGEMENT SCHEDULE AND
[PROPOSED] ORDER**

Date: April 7, 2011
Time: 2:00 p.m.
Courtroom: 3
Judge: Hon. Phyllis J. Hamilton

Complaint Filed: October 20, 2010
Trial Date: Not set

Pursuant to Local Rule 16-2(e) of the United States District Court of the Northern District of California, the parties request a continuance of the Case Management Conference as follows:

1. On February 4, 2011, the Court scheduled a Case Management Conference for April 7, 2011.

STIPULATION AND REQUEST FOR RELIEF FROM
CASE MANAGEMENT SCHEDULE
SF01/743937.2

CASE NO. 4:10-CV-04741-PJH

1 2. On March 1, 2011, Defendants moved to sever and transfer this action to each of
2 Plaintiffs' individual home districts. If Defendants' motion is granted, none of the Plaintiffs'
3 claims will remain in this Court. Defendants motion is scheduled to be heard on April 6, 2011.

4 3. All parties have agreed to request that the pending motion to sever and transfer be
5 decided before the parties move forward with this lawsuit.

6 WHEREFORE Plaintiffs and Defendants, hereby stipulate by the undersigned counsel to
7 request that the Court continue the Case Management Conference currently set for April 7, 2011
8 for an additional 90 days or to a date convenient to the Court.

9 Dated: March 15, 2011

DRINKER BIDDLE & REATH LLP

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11 By:/s/ Michelle A. Childers
Michelle A. Childers

12 Attorneys for Defendants
13 ETHICON WOMEN'S HEALTH &
14 UROLOGY DIVISION OF ETHICON, INC.
(erroneously sued as GYNECARE, INC.);
15 ETHICON, INC.; and JOHNSON &
JOHNSON

16 Dated: March 15, 2011

GIRARDI & KEESE

17 By:/s/ Amanda Kent
18 Thomas V. Girardi
Amy Fisch Solomon
Amanda Kent

19 Attorneys for Plaintiffs

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21 The Case Management Conference scheduled for April 7, 2011 is hereby continued until
22 July 7, 2011.

23 PURSUANT TO STIPULATION, IT IS SO ORDERED.

24 Dated: 3/16/11

25 BY THE COURT

26 Honorable Phyllis J. Hamilton
United States District Judge

